

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Fort Lauderdale Division

CARMEN BLANCO,

CASE NO: 00-6006-CIV-ZLOCH

Plaintiff,
vs.

MICHAEL W. MOORE, Secretary of the
FLORIDA DEPARTMENT OF CORRECTIONS,
in his Official Capacity, and
FLORIDA DEPARTMENT OF CORRECTIONS

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S. J. H.
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Defendants.

REQUEST FOR ENLARGEMENT OF TIME WITHIN WHICH TO FILE A
RESPONSE TO DEFENDANT'S RENEWED MOTION TO DISMISS

Plaintiff, CARMEN BLANCO, by and through her undersigned attorneys, moves for the entry of an order enlarging the period of time within which to file a response to Defendants' Motion to Dismiss and states:

1. Plaintiff respectfully requests an enlargement of time up through and including April 5, 2000 within which to file a response to Defendants' Motion to Dismiss.
2. From the time Plaintiff's counsel was served with Defendants' motion, Plaintiff's counsel has been working diligently to respond while also attending to many other pressing matters.
3. Counsel for Plaintiff filed a Notice of Unavailability in this case on March 6, 2000, is currently out of the jurisdiction, and will return on April 3, 2000.
4. Counsel for Defendants has been contacted and stated she has no objection to an extension of time.
5. This motion is made in good faith and is not for the purpose of delay. No party will be unfairly prejudiced by the requested enlargement.
6. Plaintiff would be unfairly prejudiced if this Motion is denied as she will not be able to prepare a thorough and comprehensive response to Defendants' Motion to Dismiss.

NON-COMPLIANCE OF S.D. fla. L.R. 5.1(A)(1)
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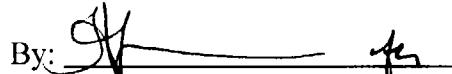
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WHEREFORE, Plaintiff respectfully requests an enlargement of time up through and including April 5, 2000 within which to serve her response to Defendants' Motion to Dismiss.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been delivered, by mail, this 27th day of March, 2000 to Elizabeth Rodriguez, Esq. 25 West Flagler Street, PH, Miami, Florida 33130 the Clerk of the Court.

HENSCHEL & HENSCHEL, P.A.
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By: 
Andrew S. Henschel, Esquire
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